

EXHIBIT “F”

From: Allred Ed <eallred@wattsguerra.com>
Subject: **Re: Extension of discovery deadline [IWOV-Interwoven.FID230834]**
Date: August 15, 2014 3:11:13 PM CDT
To: "Matthew S. Veech" <mveech@boyarmiller.com>
Cc: Chris Hanslik <chanslik@boyarmiller.com>, Edgar Saldivar <esaldivar@boyarmiller.com>, Colleen Peebles <cpeebles@wattsguerra.com>

That's not entirely accurate. I talked to your side about deposing your experts long ago, and then we followed up with a formal request for the backup papers and interview notes (including the notes that your side confirmed yesterday were the notes of Kevin McAnaney's).

I have no problem extending past September 1st for depositions, but leaving it forever open-ended on your end have historically led to lengthy delays. I am also uncomfortable with you telling me ten days from now what topics you will unilaterally agree to present, especially because you've had our notices with topics since July 25th.

But, to reach a partial agreement: I am agreeable to your proposed date of October 17th to take these depositions. I also agree that both sides should provide dates on or before August 25th, provided that a minimum of three (3) dates with locations for each requested witness is provided (to increase the odds that we can find mutually agreeable dates). In other words, on or before August 25th:

1. Plaintiff will provide to you a minimum of three (3) dates with locations for the depositions of:

- a. Relator, Mike Swetnam; and
- b. experts retained by Plaintiff; and similarly

2. Defendants will provide to Plaintiff a minimum of three (3) dates with locations for the depositions of:

- a. Ben McKibbons;
- b. witness(es) for the two corporate representative notices served on Defendants July 25, 2014; and
- c. experts retained by Defendants.

Deal?

That leaves only the issue of whatever topics you are going to refuse to produce in the future.

Ed Allred

On Aug 15, 2014, at 2:56 PM, Matthew S. Veech wrote:

Ed,

To my knowledge, today is the first time you have requested dates for our experts. Until we received your corporate rep notice two weeks ago, we had produced for deposition every individual you requested except Mr. McKibbens. On your corporate rep topics, some of the topics are objectionable and the ones that are not objectionable will likely mean multiple individuals from Valley Baptist. I am working on coordinating with the potential reps and trying to make sure we have the appropriate individual(s). There is no chance we will give you dates next week for the depositions. That was the reason for my request that we agree to extend the September 1 deadline and agree to conduct the depositions after that date.

In the past we have been able to work out agreements on scheduling. My suggestion would be that we agree to complete the depositions by October 17. If you are agreeable to that, by August 25 we will get you a letter with the topics we will produce corporate reps on and proposed dates for those depositions and Mr. McKibbens' deposition. By that same date (August 25), you will provide dates for Swetnam and your experts. After we get the dates for your experts, we will give you dates for our experts.

Matt

Matthew S. Veech

Shareholder

DIRECT 832-615-4232 **CELL** 281-755-2451

[v-Card](#) | [bio](#) | [map](#)

BoyarMiller

4265 San Felipe, Suite 1200 Houston, TX 77027

TEL 713-850-7766 **FAX** 713-552-1758

www.boyarmiller.com

<image001.gif>

Please consider the environment before choosing to print this e-mail.

Unless otherwise expressly stated in this email, no offer is made by our clients, in any respect, by the transmittal of the draft documents accompanying this email.

CONFIDENTIALITY NOTICE

This email transmission (and/or the documents accompanying it) may contain confidential information belonging to the sender which is protected by the attorney-client privilege. The information is intended only for the use of the individual or entity named above. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution or the taking of any action in reliance on the contents of this information is strictly prohibited. If you have received this transmission in error, please immediately notify us by telephone at 713-850-7766 to arrange for return of the document.

From: Allred Ed [mailto:eallred@wattsguerra.com]
Sent: Friday, August 15, 2014 1:58 PM
To: Matthew S. Veech
Cc: Chris Hanslik; Edgar Saldivar; Colleen Peebles
Subject: Re: Extension of discovery deadline [IWOV-Interwoven.FID230834]

Hello?

My office is closing early today - likely by 4:00 - so if we're going to reach an agreement about providing dates and by when we'll take the depositions then I'd like to have it wrapped up by 3:00 if at all possible. Please let me know where you are on this.

Ed

On Aug 15, 2014, at 1:11 PM, Allred Ed wrote:

Weird. I have no record of this August 5th email. But, I'll get you dates next week for these three if you'll agree to get me dates next week for those I've been asking for (McKibbons, 2 corporate reps, and your experts).

Deal?

On Aug 15, 2014, at 1:08 PM, "Matthew S. Veech" <mveech@boyarmiller.com> wrote:

Here's the email.

Matthew S. Veech

Shareholder

DIRECT 832-615-4232 **CELL** 281-755-2451

[v-Card](#) | [bio](#) | [map](#)

BoyarMiller

4265 San Felipe, Suite 1200 Houston, TX 77027

TEL 713-850-7766 **FAX** 713-552-1758

www.boyarmiller.com

<image001.gif>

Please consider the environment before choosing to print this e-mail.

Unless otherwise expressly stated in this email, no offer is made by our clients, in any respect, by the transmittal of the draft documents accompanying this email.

CONFIDENTIALITY NOTICE

This email transmission (and/or the documents accompanying it) may contain confidential information belonging to the sender which is protected by the attorney-client privilege. The information is intended only for the use of the individual or entity named above. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution or the taking of any action in reliance on the contents of this information is strictly prohibited. If you have received this transmission in error, please immediately notify us by telephone at 713-850-7766 to arrange for return of the document.

From: Allred Ed [<mailto:eallred@wattsquerra.com>]

Sent: Friday, August 15, 2014 12:11 PM

To: Matthew S. Veech

Cc: Chris Hanslik; Edgar Saldivar; Colleen Peebles

Subject: Re: Extension of discovery deadline [IWOV-Interwoven.FID230834]

Send me your August 5th email. I don't remember receiving it and it's nowhere in my emails, saved or deleted. That said, we've never

refused you a date on Swetnam's deposition and we've asked you for the depositions of McKibbons, the corporate reps, and your experts. If you want to send a proposal, I'm more than willing to review it. A motion would seem absurd, but file whatever you think you need to and we'll just let the Court know we're still waiting on you to provide all of these dates for your witnesses that were requested first. Seems silly to me, but it's your call. I think your better course would be to send me a proposal with dates and locations of McKibbons, the corporate reps, and your experts, and asking me to give you dates for Swetnam and our two experts.

Ed Allred

On Aug 15, 2014, at 12:03 PM, "Matthew S. Veech"
<mveech@boyarmiller.com> wrote:

Ed,

I have not received a response to my August 5, 2014 email requesting deposition dates for Mr. Swetnam, Mr. Benoit, and Mr. Beck. I also recognize that you have served a corporate representative deposition notice for August 27 and 28 and that you still need a date for the deposition of Ben McKibbens. Please let us know if you are agreeable to extending the September 1, 2014 discovery deadline to allow us to conduct these depositions after that date.

Also, two issues on your corporate representative notice. We will be objecting to certain topics and I don't believe the dates you have picked will work. I want to send you a letter before we file a motion so that we can try to work out an agreement on the topics

and the date(s) for the corporate representative depositions.

Please let me know your position on the extension.

Matt

Matthew S. Veech

Shareholder

DIRECT 832-615-4232 **CELL** 281-755-2451

[v-Card](#) | [bio](#) | [map](#)

BoyarMiller

4265 San Felipe, Suite 1200 Houston, TX 77027

TEL 713-850-7766 **FAX** 713-552-1758

www.boyarmiller.com

<image001.gif>

Please consider the environment before choosing to print this e-mail.

Unless otherwise expressly stated in this email, no offer is made by our clients, in any respect, by the transmittal of the draft documents accompanying this email.

CONFIDENTIALITY NOTICE

This email transmission (and/or the documents accompanying it) may contain confidential information belonging to the sender which is protected by the attorney-client privilege. The information is intended only for the use of the individual or entity named above. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution or the taking of any action in reliance on the contents of this information is strictly prohibited. If you have received this transmission in error, please immediately notify us by telephone at 713-850-7766 to arrange for return of the document.

Unless otherwise expressly stated in this email, no offer is made by our clients, in any respect, by the transmittal of the draft documents accompanying this email. CONFIDENTIALITY NOTICE This email transmission (and/or the documents

accompanying it) may contain confidential information belonging to the sender which is protected by the attorney-client privilege. The information is intended only for the use of the individual or entity named above. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution or the taking of any action in reliance on the contents of this information is strictly prohibited. If you have received this transmission in error, please immediately notify us by telephone at 713-850-7766 to arrange for return of the document.

Unless otherwise expressly stated in this email, no offer is made by our clients, in any respect, by the transmittal of the draft documents accompanying this email. CONFIDENTIALITY NOTICE This email transmission (and/or the documents accompanying it) may contain confidential information belonging to the sender which is protected by the attorney-client privilege. The information is intended only for the use of the individual or entity named above. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution or the taking of any action in reliance on the contents of this information is strictly prohibited. If you have received this transmission in error, please immediately notify us by telephone at 713-850-7766 to arrange for return of the document.

<mime-attachment>

Unless otherwise expressly stated in this email, no offer is made by our clients, in any respect, by the transmittal of the draft documents accompanying this email. CONFIDENTIALITY NOTICE This email transmission (and/or the documents accompanying it) may contain confidential information belonging to the sender which is protected by the attorney-client privilege. The information is intended only for the use of the individual or entity named above. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution or the taking of any action in reliance on the contents of this information is strictly prohibited. If you have received this transmission in error, please immediately notify us by telephone at 713-850-7766 to arrange for return of the document.

